

1                               IN THE UNITED STATES DISTRICT COURT  
2                               WESTERN DISTRICT OF VIRGINIA  
3                               ROANOKE DIVISION  
4  
5

6   - - - - -  
7   BRIAN SCOTT DUNN,                               )  
8                               Plaintiff                               )  
9   -vs-                               )  
10   SHERIFF MORGAN MILLIRONS,                               )  
11                               Defendant                               )  
12   - - - - -

CASE NO.:  
7:14cv00429

15   DEPOSITION OF:   CHASTITY M. JONES

17   DATE:                   APRIL 10, 2015 (Friday)

18   TIME:                   10:05 a.m.

19   LOCATION:                Giles County Administration Building  
20                            315 North Main Street  
21                            Pearisburg, Virginia 24134

22   REPORTER:             Lisa M. Hooker, RPR  
23                            Registered Professional Reporter #29505  
24

**BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS**  
**Chastity M. Jones on 04/10/2015**

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1	I N D E X		1	CHASTITY M. JONES	
2			2	having been sworn by the Registered Professional Reporter,	
3	EXAMINATION BY:	PAGE	3	Lisa M. Hooker, to tell the truth, the whole truth, and	
4	Thomas E. Strelka, Esq.	4	4	nothing but the truth, testified as follows:	
5	Jim H. Gynn, Jr., Esq.	53	5		
6	Thomas E. Strelka, Esq.	56	6	EXAMINATION BY THOMAS E. STRELKA, ESQ.	
7			7	Q. Good morning, ma'am. As I indicated to you	
8	Appearance Page .....	3	8	earlier, I'm Tommy Strelka and I represent Mr. Dunn, the	
9	Exhibit Page .....	3	9	Plaintiff in this matter, and bear with me as I continue	
10	Witness Signature Page .....	58	10	to set up. The -- would you please state your name for	
11	Witness Signature Waiver .....	---	11	the Record.	
12	Reporter's Certificate .....	59	12	A. Chastity Michelle Jones.	
13	Errata Sheet .....	60	13	Q. And Ms. Jones, I'm sorry, I thought that	
14			14	your last name was Perkins. I assume that has been	
15			15	changed at some point?	
16			16	A. Yes.	
17			17	Q. You got married?	
18			18	A. Yes.	
19			19	Q. Congratulations; when did you get married?	
20			20	A. February.	
21			21	Q. Okay, very recently. Okay, Ms. Jones, this	
22			22	is a deposition; have you ever been deposed before?	
23			23	A. No, sir.	
24			24	Q. All right, and well, it is pretty easy.	
Page 3			Page 5		
1	A P P E A R A N C E S		1	All you have to do is answer the questions that I ask you,	
2	FOR THE PLAINTIFF: STRELKA LAW OFFICE, PC		2	or Mr. Gynn next to you asks; you are under Oath, and I	
3	Attorneys at Law		3	will try to get you out of here as quick as possible,	
4	119 Norfolk Avenue, SW		4	okay.	
5	Suite 330		5	A. Yes.	
6	Roanoke, Virginia 24011		6	Q. Just a few little rules. If I ask you a	
7	(540) 283-0802		7	yes or no question, I'd ask that you provide a yes or no	
8	(no fax available)		8	answer and try to stay away from the hmm-hmm's and the	
9	thomas@strelkalaw.com		9	uh-huh's and -- you know, because it could be misconstrued	
10	BY: THOMAS E. STRELKA, ESQ.		10	on the transcript. She's typing up everything that we're	
11			11	saying and your huh-huh could be hmm-hmm in your ear or	
12	FOR THE DEFENDANT: GUYNN and WADDELL, PC		12	her ear and then we have a goofed up case, so do you	
13	Attorneys at Law		13	understand?	
14	415 South College Avenue		14	A. Yes, sir.	
15	Salem, Virginia 24153		15	Q. All right. Thank you, and the other thing	
16	(540) 387-2320		16	is that if, and normally in human conversation, people are	
17	(540) 389-2350		17	talking all over each other all of the time, but because	
18	jim.gynn@gmdlawfirm.com		18	she can only type up what one person is saying at a time	
19	BY: JIM H. GUYNN, JR., ESQ.		19	easily, I would ask that you completely wait -- wait until	
20			20	I'm completely done speaking until you provide an answer,	
21	ALSO PRESENT: Brian Scott Dunn		21	even if you know exactly what it is that I'm getting at.	
22	Morgan Millirons		22	The whole question has to be presented in the transcript;	
23			23	do you understand?	
24			24	A. Yes, sir.	
17	E X H I B I T S				
18	NUMBER DESCRIPTION PAGE				
19	Exhibit 41 Adoption Record dated 4-5-13.	51			

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1	Q. All right.	1	Q. Okay. Well, who told you what the job
2	MR. GUYNN: Could I interrupt for just a	2	would entail?
3	second? How do you spell your first name?	3	A. Dave Hunt.
4	THE WITNESS: C-H-A-S-T-I-T-Y.	4	Q. Dave Hunt?
5	MR. GUYNN: I've just seen it several	5	A. Yes.
6	different ways, thank you.	6	Q. And what did he tell you it would entail?
7	BY MR. STRELKA:	7	A. That I was hired as a salary employee, and
8	Q. Ms. Jones, where are you currently	8	I work six hours a day, seven days a week, and that I
9	employed?	9	would be on call at all times; if I was needed, I was
10	A. Federal Mogul.	10	called back out.
11	Q. Okay, and prior to that, where were you	11	Q. Okay, but as far as your duties, did you go
12	employed?	12	over like what you were supposed to be doing?
13	A. At the animal shelter.	13	A. I cleaned the shelter and fed the animals.
14	Q. Giles County Animal Shelter?	14	Q. Okay, anything else other than that?
15	A. Yes, sir.	15	A. Not on my job description, no, sir.
16	Q. And it is my understanding that you started	16	Q. Didn't you also have to process adoptions
17	working there before Sheriff Millirons was elected?	17	if someone came in and wanted to adopt an animal, or was
18	A. Yes, sir.	18	that somebody else?
19	Q. All right. And when did you begin working	19	A. I don't know if nobody else was there.
20	there?	20	Q. Was there any person whose role it was to
21	A. Can I get my dates?	21	do that?
22	Q. Is that what you have there? Is that that	22	A. No, sir. Whoever was there at the time
23	letter from Greenbrier?	23	done it, whether it was a volunteer, whether it was animal
24	A. Yes.	24	control or myself.
Page 7		Page 9	
1	Q. Okay. Is that -- I have a copy of that,	1	Q. Okay, so adoptions would be processed by
2	too.	2	any of those individuals that you just named, but I guess
3	A. Okay.	3	that if no one else would be there, it would be your duty
4	Q. All right.	4	to process the adoption, then?
5	A. Yes, it was around June of '05.	5	A. Yes, sir.
6	Q. Okay.	6	Q. Okay. And you were still working at the
7	A. June of '05.	7	shelter in 2008 when Sheriff Millirons was elected, right?
8	Q. June of 2005?	8	A. Yes, sir.
9	A. Yes, somewhere around there.	9	Q. Okay, and at that time, you -- well, you
10	Q. And how did you hear about this opening or	10	mentioned earlier volunteers. Were there volunteers
11	how did you know about this job in 2005?	11	attending an participating in shelter activities in 2008?
12	A. I previously worked for Dave Hunt with	12	A. Yes, sir.
13	Greenbrier, and the job ended at Celanese and he called	13	Q. Okay. And were these volunteers members of
14	and offered me the job at the animal shelter and I	14	Giles County Animal Rescue?
15	accepted.	15	A. Yes, sir.
16	Q. Okay. And do you know if anyone -- do you	16	Q. Were there other organizations, too?
17	know if Greenbrier Services had provided staffing for the	17	A. They would bring Tech students in
18	animal shelter before you?	18	sometimes.
19	A. Yes, sir, they did.	19	Q. Okay, and can you just kind of outline for
20	Q. Okay, do you know who was the previous	20	me what it is these volunteers would do when they would
21	worker?	21	come to the shelter?
22	A. I don't know.	22	A. They would hold open hours on Saturdays and
23	Q. You don't know?	23	Sundays from 2:00 to 4:00, walk the animals or do
24	A. No.	24	adoptions in that time.

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1	Q. Okay.	1	on call that if anybody arose or animal control needed me,
2	A. They would pull animals for rescue.	2	I would go back out, or if animals needed medication, I
3	Q. All right. And when was your last day that	3	had to go back out.
4	you worked at the shelter?	4	Q. Okay, and this schedule that you talked
5	A. I don't remember the exact date, but it was	5	about, that was all worked out with Mr. Hunt; is that
6	January of 2014.	6	right?
7	Q. Okay, and how did it come about that your	7	A. Mr. Hunt and Sheriff Altizer.
8	job ended at that time, and was it -- I mean, did you	8	Q. And Sheriff Altizer?
9	resign or were you told that your job was terminated?	9	A. Hmm-hmm.
10	A. No, I quit on my own.	10	Q. Okay, and in 2008 when the Sheriff was
11	Q. You quit on your own?	11	elected, Sheriff Millirons, did he ever have a discussion
12	A. Yes.	12	with you around that time about your hours or your salary?
13	Q. Okay. How did you communicate the fact	13	A. No, sir. That was between me and Dave
14	that you were quitting?	14	Hunt.
15	A. I called Dave Hunt, which is who I worked	15	Q. Okay. And so is it -- would it be fair to
16	for, and told him, and then I notified Sheriff Morgan that	16	say from your perspective that when Sheriff Millirons was
17	I was quitting.	17	elected, that you just kind of continued on as you had
18	Q. Okay. And -- all right, and during the	18	been?
19	entire time that you were working there when Sheriff	19	A. Yes, sir.
20	Millirons was elected, did -- were you ever there when the	20	Q. All right. All right. Has there ever been
21	Sheriff was also at the animal shelter?	21	any issues or difficulties between yourself and any of the
22	A. Yes, sir, I was there.	22	volunteers that would come to the shelter?
23	Q. Okay. And my point is, do you recall how	23	A. Yes, sir.
24	many times the Sheriff visited the shelter?	24	Q. All right. Can you describe some of those?
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1	A. No, sir, I didn't keep track of it.	1	A. There was several instances that the
2	Q. Okay, and did he come by once a week?	2	offices had been broken into. Things were disappearing;
3	A. I don't think that it was that frequently,	3	supplies were disappearing. They used foul language in
4	no.	4	front of the public during my open hours, and I brought it
5	Q. Okay, and I know that -- I'm not trying	5	to the attention of animal control officer and Sheriff
6	to -- I don't want you to pull a number out of thin air; I	6	Morgan.
7	don't want you to speculate, but I do want to see if we	7	Q. Okay. And who used -- do you know who used
8	can come to a more narrow focused understanding of how	8	foul language?
9	many times you went out there. Can you give me any more	9	A. I don't remember his name.
10	information about how many times you think the Sheriff	10	Q. Okay. And -- and was he a Tech student; do
11	might have appeared at the shelter?	11	you recall, or was he a --
12	A. Sir, I don't remember.	12	A. No, sir, he wasn't a Tech student. He was
13	Q. Okay. All right. So could you describe to	13	a member of GCAR.
14	me again, I think that you already mentioned this but I	14	Q. All right, I'm not asking you to sit here
15	just want to be sure that I have an understanding, what	15	and curse a blue streak, but I would like to know a little
16	your hours were day-to-day when were you at the shelter?	16	bit about what happened, so can you describe what happened
17	What were your expected hours?	17	in that incident?
18	A. I had no specific time to be there.	18	A. Him, and I'm assuming that it was his wife;
19	Q. Okay.	19	it was a lady, that came in, wanting to pull a cat. The
20	A. I was required to be there up to six hours	20	cat had already been spoken for for another rescue out of
21	a day, seven days a week.	21	Blacksburg, and I told him that. The lady was there to
22	Q. Okay.	22	get it, and he got furious with me, and he started cussing
23	A. I was hired as a salary person. When I	23	that -- do I say the word?
24	completed my job, I was allowed to leave, but I was also	24	Q. Go ahead and say it.

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Pages 14..17

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<p>1           A.     That he could fucking take any animal he</p> <p>2 wanted out there, and that the group that was getting it</p> <p>3 wasn't a legit group, and I asked him to please do not use</p> <p>4 that language, that we had the public there with small</p> <p>5 children, and he continued to go back into the kennel area</p> <p>6 where children was present and started cussing that he</p> <p>7 could pull the damn animal if he wanted to and that he was</p> <p>8 going to call his group, so I asked him politely to leave</p> <p>9 the premises out there and notified animal control. They</p> <p>10 were standing in the office when I was on the phone with</p> <p>11 animal control, and I told him that animal control asked</p> <p>12 you to leave the property, if you can't leave on your own,</p> <p>13 I will call for an officer to come and make you leave.</p> <p>14           Q.     Okay. And then you said that you reported</p> <p>15 that to the Sheriff and Mr. Millirons and to Mr. Hunt?</p> <p>16           A.     No, sir, animal control.</p> <p>17           Q.     Okay, animal control?</p> <p>18           A.     And Mr. Millirons.</p> <p>19           Q.     Okay. Was there any other incidents in</p> <p>20 which a volunteer cursed in front of the public that you</p> <p>21 felt was inappropriate, or was that the only time that you</p> <p>22 saw that?</p> <p>23           A.     No, the only time while I was present.</p> <p>24           Q.     Okay. All right, and when was that; do you</p>	<p>1 animal control officers have that key, or when you worked</p> <p>2 there, did you have access to that key?</p> <p>3           A.     Yes.</p> <p>4           Q.     Do any volunteers have access to that key?</p> <p>5           A.     Not that I knew of, no.</p> <p>6           Q.     And was it your father that had discovered</p> <p>7 that the office had been broken into?</p> <p>8           A.     I had come into that morning and noticed</p> <p>9 that the office had been broken into, and I called him.</p> <p>10           Q.     So you discovered that the office had been</p> <p>11 broken into?</p> <p>12           A.     Hmm-hmm.</p> <p>13           Q.     And you contacted your dad?</p> <p>14           A.     Hmm-hmm.</p> <p>15           Q.     Is that a yes?</p> <p>16           A.     Yes.</p> <p>17           Q.     Just walk me through the scene where you</p> <p>18 noticed that it had been broken into. I want to know what</p> <p>19 you saw.</p> <p>20           A.     The door was open, things were in disarray</p> <p>21 in the office, the chairs were moved.</p> <p>22           Q.     Okay, when was the last time that you had</p> <p>23 been in the office prior to that?</p> <p>24           A.     I don't remember.</p>
Page 15	Page 17
<p>1 recall?</p> <p>2           A.     It was the summer of last year. I don't --</p> <p>3 or the year before. I don't remember the exact date.</p> <p>4           Q.     Okay, so if you left in January of 2014, it</p> <p>5 might have been the summer --</p> <p>6           A.     Summer of 2013, yes.</p> <p>7           Q.     Okay. And you said that things were being</p> <p>8 taken. What things were being taken, or what things were</p> <p>9 missing?</p> <p>10           A.     Well, our supplies, bleach would get gone;</p> <p>11 cat litter would get gone. Our towels that we used for</p> <p>12 bedding would disappear. My collars would disappear.</p> <p>13           Q.     Okay. It is my understanding that the --</p> <p>14 in the shelter, there is a -- there is a private office</p> <p>15 for the animal control office?</p> <p>16           A.     Yes, sir.</p> <p>17           Q.     And also a lock on that, isn't there?</p> <p>18           A.     Yes, sir.</p> <p>19           Q.     And it is a lock with a key; is it a key</p> <p>20 lock?</p> <p>21           A.     No, sir.</p> <p>22           Q.     How do you access that?</p> <p>23           A.     Oh, yes, it does have a key lock.</p> <p>24           Q.     Oh, okay, who has that; does only the</p>	<p>1           Q.     Okay. It is my understanding that nothing</p> <p>2 was taken; is that right?</p> <p>3           A.     Not to my knowledge, no, sir.</p> <p>4           Q.     Okay. And -- all right, and at some point,</p> <p>5 the volunteers were no longer granted access to the</p> <p>6 shelter; is that right?</p> <p>7           A.     Yes, sir.</p> <p>8           Q.     Okay. And how -- how did you hear about</p> <p>9 that?</p> <p>10           A.     Animal control.</p> <p>11           Q.     Okay, and who? I mean, was it your dad?</p> <p>12           A.     Officer Dalton, yes.</p> <p>13           Q.     He said it is your decision; you are not</p> <p>14 going to let them in anymore?</p> <p>15           A.     It was a decision between him and the</p> <p>16 Sheriff; it had nothing to do to me, but they brought it</p> <p>17 to my attention.</p> <p>18           Q.     How was it brought to your attention?</p> <p>19           A.     They told me that they agreed that GCAR</p> <p>20 could not come in and open hours for volunteers or</p> <p>21 adoptions, but they were still allowed to come and pull an</p> <p>22 animal for a rescue group as long as someone was there.</p> <p>23           Q.     Okay. And did your -- did your father</p> <p>24 indicate -- I think that you said that he had discussed</p>

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<p>1 this with the Sheriff?</p> <p>2 A. Yes, that was a decision between them.</p> <p>3 Q. Okay, and did he -- when he told you about</p> <p>4 it, did he indicate whether he and the Sheriff had talked</p> <p>5 to anyone else about this in making their decision?</p> <p>6 A. No, sir, that had nothing to do with me.</p> <p>7 Q. Okay. And did you ever -- and after this</p> <p>8 happened and the volunteers were no longer allowed, or had</p> <p>9 limited access as you described to the shelter, did any</p> <p>10 member of GCAR complain to you personally about what was</p> <p>11 going on?</p> <p>12 A. Not to me personally, no.</p> <p>13 Q. Okay. And -- all right, and at some point,</p> <p>14 someone complained -- made a complaint to the Virginia</p> <p>15 Department of Agriculture; is that right?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And do you know who complained?</p> <p>18 A. Christine Link.</p> <p>19 Q. Okay, and did she ever tell you, like, you</p> <p>20 know, something along the lines of I'm going to complain,</p> <p>21 or you better clean up this place or I'm going to</p> <p>22 complain?</p> <p>23 A. No, sir.</p> <p>24 Q. She didn't give you any heads-up that that</p>	<p>1 A. I didn't see Christine or have to --</p> <p>2 Q. Are you aware that at some point, you were</p> <p>3 accused of not working the number of hours that you were</p> <p>4 supposed to be working?</p> <p>5 A. Yes, sir, I'm aware of that.</p> <p>6 Q. Okay, do you know who accused you of that?</p> <p>7 A. Christine Link.</p> <p>8 Q. And do you admit or -- I mean, how do</p> <p>9 you -- what is your response to that accusation?</p> <p>10 A. Again, if I was -- it goes back to my job.</p> <p>11 When I was hired, I was hired as a salary person. When I</p> <p>12 completed my job duties I was allowed to leave, but I was</p> <p>13 always on call.</p> <p>14 Q. Okay. And you were also required to be</p> <p>15 there six hours a day; isn't that right, didn't you say</p> <p>16 that earlier?</p> <p>17 A. That is what was -- I wasn't required to</p> <p>18 stay six hours. When I completed my duties, I was able to</p> <p>19 leave, but I was on call.</p> <p>20 Q. Okay, and did you sign a contract with</p> <p>21 Greenbrier Services?</p> <p>22 A. No, sir, I didn't.</p> <p>23 Q. All right. Did you ever speak with the</p> <p>24 investigator for the Department of Agriculture?</p>
Page 19	Page 21
<p>1 was going to happen?</p> <p>2 A. No, sir.</p> <p>3 Q. So -- the -- she may not have told you that</p> <p>4 she was going to complain to the department, but did she</p> <p>5 ever, prior to the Department of Agriculture getting</p> <p>6 involved in this, did she ever just complain to you</p> <p>7 personally about some of her observations at the shelter?</p> <p>8 A. No, sir, she did not.</p> <p>9 Q. Not once?</p> <p>10 A. No.</p> <p>11 Q. All right. Do you know if any members of</p> <p>12 GCAR had ever complained to the Sheriff?</p> <p>13 A. I don't know. I have no idea.</p> <p>14 Q. Okay. I was just wondering if anyone ever</p> <p>15 talked about it to you or you ever heard about it. Are</p> <p>16 you aware of whether any members of GCAR ever complained</p> <p>17 about what was going on to Officer Dalton?</p> <p>18 A. Again, that would have nothing to do with</p> <p>19 me. That would be between them. I don't know.</p> <p>20 Q. Okay.</p> <p>21 A. I mean, I went out and done my cleaning and</p> <p>22 feeding before they got there, and I was gone before they</p> <p>23 got there.</p> <p>24 Q. Okay.</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Okay. And she -- she interviewed you?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Okay. And were you forthright and honest</p> <p>5 with your responses to the Department of Agriculture?</p> <p>6 A. Yes, sir, everything was founded as lies</p> <p>7 against me.</p> <p>8 Q. Okay.</p> <p>9 MR. GUYNN: I'm sorry, I didn't understand</p> <p>10 what you just said. I apologize, could you repeat</p> <p>11 that?</p> <p>12 THE WITNESS: The accusations that were</p> <p>13 made against me was unfounded. They were all</p> <p>14 found to be lies.</p> <p>15 BY MR. STRELKA:</p> <p>16 Q. Okay. Did you ever speak to any members of</p> <p>17 the Board of Giles County about what was happening at the</p> <p>18 animal shelter?</p> <p>19 A. Yes, sir, I did.</p> <p>20 Q. Okay. And do you recall when that might</p> <p>21 have been?</p> <p>22 A. No, sir, I don't remember the exact date.</p> <p>23 Q. Okay. But it was a Board meeting; is that</p> <p>24 right?</p>

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1	A. Yes, sir, I was at a Board meeting.	1	Q. And those were on the weekdays; is that
2	Q. Okay, and if I indicated to you that our	2	right, or was that every day that you did that?
3	records indicate that it was January 8th, 2014, does that	3	A. That was every day.
4	sound about right?	4	Q. Every day?
5	A. I don't recall the exact date.	5	A. Yes.
6	Q. All right.	6	Q. All right.
7	A. I don't.	7	A. Seven days a week.
8	Q. But you have no reason to think that that	8	Q. All right. And so from what you are saying
9	isn't the date, do you?	9	about these accusations, I take it that your position is
10	A. No, sir.	10	that if members of GCAR are saying that you weren't there
11	Q. Okay. All right. And do you recall what	11	as much as you are indicating now that you were, that they
12	you said to the Board?	12	are lying?
13	A. No, sir, I don't.	13	A. Yes, they are lying.
14	Q. Nothing at all? Sitting here today, you	14	Q. Why would they be lying?
15	have no memory of anything that you said to the Board?	15	A. They wasn't out there during the week, so
16	A. I don't remember, no.	16	they didn't know when I was there and when I wasn't. They
17	Q. You don't remember any question that they	17	were only there on the weekends.
18	asked you?	18	Q. All right. Did you ever have to write a
19	A. No, sir, I don't.	19	letter describing your working relationship with
20	Q. I mean, you don't remember -- do you	20	Greenbrier and the animal shelter because of these
21	remember any of the issues that you talked about?	21	accusations?
22	A. Volunteers, I think was maybe some of the	22	A. I had to list -- I had to write a list of
23	issues. I don't remember exactly, no, sir, I don't.	23	my job duties, what my job required, or what I done.
24	Q. Did anyone ask you whether you were working	24	Q. Okay, is this what you wrote, and this is
Page 23		Page 25	
1	the hours that you were supposed to be working or how many	1	Exhibit Number 12 that was previously admitted?
2	hours were you working, did anyone ask you about hours?	2	A. Yes, hmm-hmm, yes, sir.
3	A. They may have. It may have been brought	3	Q. Okay. Hold on to that. I might want to
4	up. I don't remember.	4	ask you a few questions about it. Who -- who told you to
5	Q. What time would you typically get to the	5	write that?
6	shelter? Well, was there a typical time that you got to	6	A. I wrote it on my own.
7	the shelter, is maybe a better question.	7	Q. Okay. And so you weren't directed to write
8	A. Usually I was there by 8:30.	8	this by anybody?
9	Q. In the morning?	9	A. No.
10	A. Hmm-hmm.	10	Q. Okay, why did you write it?
11	Q. Is that a yes?	11	A. Because my name had been slandered in the
12	A. Yes, sir.	12	newspapers, and that I wasn't working the time that I was
13	Q. And is there -- would there also be a	13	required, that I was stealing dog food, and I wanted it to
14	typical time when you would leave the shelter?	14	stop.
15	A. Usually around 11:00. It depends on how	15	Q. Okay. And let's talk about the stealing of
16	full the shelter was. Some days I was there until 2:00 or	16	the dog food. Did you ever steal dog food from the pound?
17	3:00.	17	A. No, sir.
18	Q. Okay, and typically -- after you left	18	Q. All right. And I think that it was
19	around the times that you just indicated, typically, you	19	reported that you were seen putting food into the back of
20	would not come back in that particular day, would you?	20	a vehicle and leaving the pound, or leaving the shelter?
21	A. Not unless I was called out.	21	A. No, sir, I didn't.
22	Q. Okay. All right, unless you were called	22	Q. Has that ever happened?
23	out?	23	A. No, sir, I have a five pound yorkie; I
24	A. Or I had to give medication to an animal.	24	don't need to steal no dog food.

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<p>1 Q. So you have never taken any bags of food</p> <p>2 out of a shelter and put them in the truck and driven it</p> <p>3 away?</p> <p>4 A. No. I've put some on the back of it and</p> <p>5 drove it over to the field that was out of date and had</p> <p>6 worms on it and dumped it for the birds, because</p> <p>7 physically, I could not carry it.</p> <p>8 Q. All right, did you ever travel to work from</p> <p>9 home in a Giles County sheriff vehicle?</p> <p>10 A. No, sir, I traveled from home in my</p> <p>11 personal vehicle, and there was times that I used an old</p> <p>12 blue truck, unmarked, to pick up supplies or donations</p> <p>13 from Walmart.</p> <p>14 Q. Okay.</p> <p>15 A. And take to the shelter.</p> <p>16 Q. All right. And -- but you never used a</p> <p>17 sheriff's vehicle during the course of your duties at the</p> <p>18 animal shelter; is that what you are saying?</p> <p>19 A. No, sir, I did not.</p> <p>20 Q. All right. All right, and so when you</p> <p>21 wrote this letter in November, November 15th, 2015, is</p> <p>22 that the date that you wrote it?</p> <p>23 A. Yes, sir.</p> <p>24 Q. So you wrote this to collect your thoughts</p>	<p>1 with you the placement of any cameras at the shelter?</p> <p>2 A. Yes, sir.</p> <p>3 Q. And who discussed the placement of cameras</p> <p>4 at the shelter with you?</p> <p>5 A. Sheriff Morgan and my father.</p> <p>6 Q. Okay. And was that -- they did that</p> <p>7 together, or were those two separate incidents that you</p> <p>8 were talking about?</p> <p>9 A. No, it was separate.</p> <p>10 Q. Okay, well, why don't we talk about what</p> <p>11 you discussed with the Sheriff. What did you guys talk</p> <p>12 about?</p> <p>13 A. He had informed me that they would be</p> <p>14 putting cameras out at the shelter to monitor, and a time</p> <p>15 clock.</p> <p>16 Q. Did he come out to the shelter to tell you</p> <p>17 that or was this over the phone?</p> <p>18 A. No, it was at his office. I had come by.</p> <p>19 Q. Okay. And do you recall around when that</p> <p>20 might have been?</p> <p>21 A. It was before -- right before I quit, it</p> <p>22 all happened.</p> <p>23 Q. Okay. All right. And when did you speak</p> <p>24 with your dad about cameras being placed out there?</p>
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<p>1 to defend yourself against the accusations?</p> <p>2 A. Yes, sir.</p> <p>3 Q. And who did you give the letter to?</p> <p>4 A. I don't remember if I gave it to the</p> <p>5 Sheriff or the Board or who I gave it to.</p> <p>6 Q. Okay. At any time while you were working</p> <p>7 at the shelter, did you ever take a stick and poke and</p> <p>8 poke and poke at an animal?</p> <p>9 A. No, sir, I did not.</p> <p>10 Q. Are you aware that someone accused you of</p> <p>11 doing that?</p> <p>12 A. Yes, sir, and that was unfounded.</p> <p>13 Q. Okay. How do you know that it was</p> <p>14 unfounded?</p> <p>15 A. It is in the report.</p> <p>16 Q. Okay. And is there any incident that you</p> <p>17 can recall in which someone might have been confused about</p> <p>18 the scenario I just described?</p> <p>19 A. No, sir. I've never been cruel to an</p> <p>20 animal. I was never there when volunteers were there,</p> <p>21 very seldom. My job duties and my cleaning and my feeding</p> <p>22 were done before the GCAR arrived to open hours at 2:00</p> <p>23 p.m.</p> <p>24 Q. Okay. Do you recall anyone ever discussing</p>	<p>1 A. I do not remember the exact date.</p> <p>2 Q. Was it before or after your discussion with</p> <p>3 Mr. Millirons?</p> <p>4 A. It was after.</p> <p>5 Q. Okay. And did anyone ever indicate to you</p> <p>6 that there was a problem with funding to get cameras out</p> <p>7 there?</p> <p>8 A. No, sir, that had nothing to do with me.</p> <p>9 Q. Okay. All right, and when you got to work,</p> <p>10 there wasn't a time sheet where you signed in, was there?</p> <p>11 A. No, sir.</p> <p>12 Q. And as you just said, there wasn't a time</p> <p>13 clock, either, was there?</p> <p>14 A. No, sir.</p> <p>15 Q. So there wasn't any record at all kept</p> <p>16 about what hours you were actually working?</p> <p>17 A. No, sir, because I was salary.</p> <p>18 Q. Okay, and again, you weren't told to keep a</p> <p>19 record by anyone?</p> <p>20 A. No, sir, I was not.</p> <p>21 Q. Okay. And how would you get paid? Would</p> <p>22 you have -- did you submit any paperwork at the end of any</p> <p>23 time period to get payment?</p> <p>24 A. No, sir, Dave paid me straight, 42 hours a</p>



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<p>1 week salary.</p> <p>2 Q. So the checks just kept coming and you kept</p> <p>3 working?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Okay. And so you never had to handle any,</p> <p>6 for instance, invoice regarding your services?</p> <p>7 A. No, sir.</p> <p>8 Q. Okay. And did you ever work more than 40</p> <p>9 hours a week?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And did you ever get paid overtime for</p> <p>12 that?</p> <p>13 A. No, sir, because I was salary.</p> <p>14 Q. Would you be interested to know that you</p> <p>15 don't -- just because you are salary, that does not mean</p> <p>16 that you are entitled to overtime?</p> <p>17 A. I don't know.</p> <p>18 Q. So it is the Fair Labor Standards Act; I'm</p> <p>19 an employment lawyer, and one of my favorite things,</p> <p>20 people always get that one confused. You said that you</p> <p>21 never got paid overtime?</p> <p>22 A. No, sir.</p> <p>23 Q. You never made a claim for it?</p> <p>24 A. No, sir.</p>	<p>1 into and our supplies went missing.</p> <p>2 Q. Okay, so you put the food -- was it in a</p> <p>3 closet or separate room?</p> <p>4 A. It was a separate room, I guess that you</p> <p>5 would kind of say like a closet --</p> <p>6 Q. Okay.</p> <p>7 A. -- area.</p> <p>8 Q. And when that was done, who had a key to</p> <p>9 have access to that room?</p> <p>10 A. Both animal control officers and myself.</p> <p>11 Q. Okay, and it was understood that no member</p> <p>12 of GCAR was to have a key?</p> <p>13 A. Not to our food room, no.</p> <p>14 Q. Okay. All right, and are you aware of any</p> <p>15 occasion in which volunteers broke in to get food out of</p> <p>16 the food room?</p> <p>17 A. Not the food room, not that I am aware of.</p> <p>18 Q. Not that you are aware of, okay. So prior</p> <p>19 to the break-in into the animal control office, the food</p> <p>20 was not under lock and key?</p> <p>21 A. No, sir.</p> <p>22 MR. GUYNN: I'm sorry, that is not going to</p> <p>23 come out.</p> <p>24 MR. STRELKA: You are right. Okay.</p>
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<p>1 Q. You never talked to Mr. Hunt about it?</p> <p>2 A. No, sir.</p> <p>3 Q. Did you ever talk to the Sheriff about it?</p> <p>4 A. No, sir.</p> <p>5 Q. Do you know an April Lowry?</p> <p>6 A. Yes, sir.</p> <p>7 Q. And who is that?</p> <p>8 A. She is a GCAR member.</p> <p>9 Q. Did she ever approach you with any issues</p> <p>10 of difficulties about the shelter?</p> <p>11 A. Not to my knowledge, that I can remember,</p> <p>12 no.</p> <p>13 Q. Okay. Did she ever discuss with you</p> <p>14 cameras at the shelter?</p> <p>15 A. No, sir.</p> <p>16 Q. Did any member of GCAR ever discuss with</p> <p>17 you cameras at the shelter?</p> <p>18 A. No, sir.</p> <p>19 Q. Are you aware of a time when the area in</p> <p>20 which the food was stored at the shelter was kept under</p> <p>21 lock and key?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Okay. And that was in 2013, wasn't it?</p> <p>24 A. That was after the offices had been broken</p>	<p>1 MR. GUYNN: Do you mind rephrasing?</p> <p>2 MR. STRELKA: You are good on that,</p> <p>3 catching it. I will just rephrase the question a</p> <p>4 little bit.</p> <p>5 BY MR. STRELKA:</p> <p>6 Q. Would you agree with me that prior to the</p> <p>7 animal control office being broken into, that the food was</p> <p>8 accessible by any volunteer?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. I think I got it.</p> <p>11 MR. GUYNN: Yes, it is the same answer you</p> <p>12 gave before, but when we go back and read the</p> <p>13 transcript, when you said no, we will be confused,</p> <p>14 but you cleared it up, thank you.</p> <p>15 BY MR. STRELKA:</p> <p>16 Q. Do you remember any occasion in which food</p> <p>17 was kept under lock and key prior to the animal control</p> <p>18 office being broken into?</p> <p>19 A. Not our food room. Our supplies, our</p> <p>20 bleach, cleaning stuff was under --</p> <p>21 Q. Lock and key?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And were those always kept under</p> <p>24 lock and key?</p>

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1	A. Not always.	1	performance at the shelter, for lack of a better term?
2	Q. And when did they -- when did that start?	2	A. Yes, sir.
3	A. I don't remember the exact date, but when	3	Q. Okay. Did you ever address that issue,
4	our supplies started to go missing.	4	those accusations, with any member of GCAR?
5	Q. Okay. Did you ever post up anything on	5	A. No, I didn't, not -- not personally with
6	social media about what was going on with the animal	6	them, no.
7	shelter?	7	Q. Did you ever send them any messages over
8	A. No, sir, I didn't.	8	the Internet about that?
9	Q. Okay, did anyone post up anything about the	9	A. No, I didn't, no, sir.
10	animal shelter on your social media page about what was	10	Q. Okay. Did you ever post anything up on
11	going on?	11	that page, that topics page?
12	A. Not that I remember. My name was posted	12	A. No, sir. I didn't.
13	and slandered all over the place.	13	Q. Okay. All right, I'm going to read to you
14	Q. But you didn't have anything to do with	14	an email. You didn't write this email, okay, and I will
15	that?	15	let you know that from what it says on the email, it says
16	A. No, sir.	16	that Christine Link-Owens wrote the email, okay, but I'm
17	Q. Did anyone send you email messages accusing	17	going to read to you this brief paragraph, and I want you
18	you of bad conduct in relation to the shelter?	18	to tell me if you agree or disagree with what is said in
19	A. I don't think they approached me	19	this paragraph, okay?
20	personally, no.	20	A. Hmm-hmm.
21	Q. Okay. How do you know these people were	21	Q. All right. "Chastity, kennel worker,
22	slandering your name?	22	arrived on March 30th while her volunteers were still
23	A. Because I read it.	23	there. We go in and take photographs of pets to list them
24	Q. Just in the paper?	24	on the Internet for adoption. She had two young boys in
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1	A. The paper, Internet.	1	there which she turned loose in the shelter so they could
2	Q. What was on the Internet, the news article,	2	help her. They began letting dogs out of the kennels,
3	or was there anything else that you were reading?	3	letting them mix, putting two and three at a time in the
4	A. No, there were different things.	4	outdoor runs together. This is a dangerous game for some,
5	Q. Such as?	5	if there is one, and the boys have no idea whether the
6	A. They slandered my name that I sold food, I	6	dogs get along or not and just randomly putting two or
7	mistreated animals, I was a whore.	7	three dogs together to run outside so they can hose the
8	Q. Okay, where were these comments posted?	8	runs. The dogs can get hurt and disease can be spread,
9	You said on the Internet. I'm just wondering what website	9	not to mention they may have been mixed males and females
10	were you looking at where you were seeing this stuff?	10	together." Did this situation ever occur?
11	A. I don't remember the --	11	A. No, sir. I don't have small children.
12	Q. Were you reading it in a news story that	12	Q. Well, I didn't ask if you had small
13	was published on line?	13	children, but did you ever bring small children to the
14	A. No, it was a --	14	shelter?
15	Q. Was it a message board?	15	A. No, sir.
16	A. Yes, I guess that is what you could call	16	Q. There is no other kennel worker that was
17	it. Topics.	17	working in 2013 other than you; is that right?
18	Q. Topics?	18	A. Yes, sir, just me.
19	A. Yes.	19	Q. Okay. And so if Ms. Link-Owens wrote this,
20	Q. Okay. And do you know who these people	20	she was either highly confused or making it up?
21	were or were they posted anonymously?	21	A. Exactly.
22	A. They identified themselves as GCAR members.	22	Q. Okay. And she further indicates that
23	Q. So GCAR members were posting, from what you	23	"During this incident that a cat escaped, and were it not
24	could tell, were posting up accusations about your work	24	for our volunteer would have been outside while the kids

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<p>1 ran to find Chastity;" do you recall that occurring?</p> <p>2 A. No, sir I don't.</p> <p>3 Q. And there's another paragraph, "On</p> <p>4 Saturday, April 20, because Chastity had plans, the</p> <p>5 shelter was closed. Please note this is not a way to run</p> <p>6 a business." Do you recall ever not appearing on a</p> <p>7 Saturday?</p> <p>8 A. No, sir, the only time that the shelter was</p> <p>9 closed was during holidays.</p> <p>10 Q. Okay, so other than holidays, you are</p> <p>11 telling me that you were there every day of the weekend?</p> <p>12 A. Yes, sir, because the shelter was always</p> <p>13 open except for holidays.</p> <p>14 Q. All right.</p> <p>15 A. It was closed to the public, but I still</p> <p>16 had to go.</p> <p>17 Q. All right, so if Ms. Link-Owens wrote this,</p> <p>18 she must have been confused or making it up, is what you</p> <p>19 are saying?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Okay. And do you recall in 2013</p> <p>22 individuals contacting the shelter trying to -- well, no,</p> <p>23 strike that. Okay, I said a stick earlier. Let me just</p> <p>24 read this, I think that I know what your response will</p>	<p>1 Q. All right.</p> <p>2 A. And that was reported to the --</p> <p>3 Q. Right. Prior to anything being reported in</p> <p>4 the newspaper, did you ever have a meeting with the</p> <p>5 Sheriff about any complaints that were being made about</p> <p>6 the shelter?</p> <p>7 A. I don't remember, no.</p> <p>8 Q. Okay. Okay. There was a part-time animal</p> <p>9 control officer, too, Mr. Gough?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And my understanding is that he took -- he</p> <p>12 took off for some pretty long vacations; is that your</p> <p>13 understanding?</p> <p>14 A. I don't know where he went. I mean, he had</p> <p>15 nothing to do with me.</p> <p>16 Q. Okay, how often would you see Mr. Gough</p> <p>17 when you worked at the shelter?</p> <p>18 A. I would see him at least once a day.</p> <p>19 Q. Once a day, every day?</p> <p>20 A. If he was on duty.</p> <p>21 Q. Okay, do you know how many hours a week he</p> <p>22 worked?</p> <p>23 A. No, sir, that had nothing to do with me.</p> <p>24 Q. But you were there from time to time; I'm</p>
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<p>1 be. I will purport to you this is what looks to be an</p> <p>2 email, and it states From: Christine Link-Owens.</p> <p>3 "On April 20, two volunteers watched in</p> <p>4 horror as the kennel help took a broom handle and poked at</p> <p>5 a little Chihuahua mix. She came in as a stray and was</p> <p>6 labeled as aggressive and no one was allowed to adopt her.</p> <p>7 She had been painted pink; she was well cared for. The</p> <p>8 dog growled at everyone that approached the kennel, and</p> <p>9 the kennel helper was getting it to bite at the stick.</p> <p>10 She bragged how mean it was and that her dad was going to</p> <p>11 put it to sleep." Does this refresh your memory about</p> <p>12 whether this occurred?</p> <p>13 A. No, it never occurred.</p> <p>14 Q. All right. And as you testified earlier,</p> <p>15 there was no other situation that anyone could reasonably</p> <p>16 believe that this happened?</p> <p>17 A. No, sir, I never abused any animal.</p> <p>18 Q. Did the Sheriff or Mr. Hunt ever approach</p> <p>19 you in 2013 to discuss the complaints that they were</p> <p>20 receiving from members of GCAR?</p> <p>21 A. Yes, sir. I met Mr. Millirons several</p> <p>22 times.</p> <p>23 Q. And what did you all talk about?</p> <p>24 A. The accusations that was made towards me.</p>	<p>1 just wondering if, from your powers of observation, you</p> <p>2 had any idea from your perspective how many hours this man</p> <p>3 might be working there per week?</p> <p>4 A. No, he would bring an animal in and do his</p> <p>5 paperwork and leave.</p> <p>6 Q. Did you ever include cats to be kept with</p> <p>7 dogs at the shelter?</p> <p>8 A. No, sir.</p> <p>9 Q. And are you aware of any GCAR member</p> <p>10 accusing you of doing that?</p> <p>11 A. No, sir.</p> <p>12 Q. Would the shelter ever receive free food</p> <p>13 from any source?</p> <p>14 A. Walmart donated.</p> <p>15 Q. Animal food?</p> <p>16 A. Hmm-hmm.</p> <p>17 Q. Is that a yes?</p> <p>18 A. Yes.</p> <p>19 Q. And at some point during the course of your</p> <p>20 employment, did you request a raise?</p> <p>21 A. Several times, yes.</p> <p>22 Q. Several times, you did?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And you did get one at some point,</p>

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<p>1 right, or no?</p> <p>2 A. When minimum wage went up to \$7.25; it went</p> <p>3 from \$7 to \$7.25.</p> <p>4 Q. Did you ever get a raise after that?</p> <p>5 A. No, sir, I didn't.</p> <p>6 Q. Did you ever talk to the Sheriff about</p> <p>7 getting a raise?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And what was his response?</p> <p>10 A. It would be up to the Board.</p> <p>11 Q. Okay. And did he say that he would support</p> <p>12 your request?</p> <p>13 A. Yes, yes, sir.</p> <p>14 Q. Okay. And do you recall when that might</p> <p>15 have been?</p> <p>16 A. No, sir, I don't.</p> <p>17 Q. During the course of your employment at the</p> <p>18 shelter, there was no manual or employee handbook for you</p> <p>19 to know the policies and procedures of the shelter, was</p> <p>20 there?</p> <p>21 A. No, sir.</p> <p>22 Q. Okay. And I guess that there wasn't</p> <p>23 anything written anywhere for you showing your job</p> <p>24 description?</p>	<p>1 A. They were collected and locks were changed</p> <p>2 and they had to check them out at dispatch.</p> <p>3 Q. Okay. And was that the only place that the</p> <p>4 key was located? Was that dispatch, as far as you know?</p> <p>5 A. To my knowledge.</p> <p>6 Q. Okay, there wasn't a lock box on a gate</p> <p>7 somewhere that also had a key, a combination box?</p> <p>8 A. At one point.</p> <p>9 Q. Okay.</p> <p>10 A. GCAR did that.</p> <p>11 Q. Okay. They put a combination box?</p> <p>12 A. Yes.</p> <p>13 Q. At the shelter with a key in it?</p> <p>14 A. On the gate, yes.</p> <p>15 Q. Okay. And was that after the key had been</p> <p>16 -- the other key had been put at dispatch for access?</p> <p>17 A. No, I believe that that was before.</p> <p>18 Q. Okay. And when the key was put at</p> <p>19 dispatch, was that combination box removed?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. All right. And did you ever hear</p> <p>22 about any member of GCAR having difficulty obtaining the</p> <p>23 key from dispatch?</p> <p>24 A. No, sir.</p>
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<p>1 A. No, sir.</p> <p>2 Q. Did you ever ask for that?</p> <p>3 A. No, sir.</p> <p>4 Q. And at any time did you ever see any of the</p> <p>5 photographs that were submitted to the Department of</p> <p>6 Agriculture?</p> <p>7 A. Yes, sir, I did.</p> <p>8 Q. And at what point did you see those</p> <p>9 photographs?</p> <p>10 A. When she interviewed me at the shelter.</p> <p>11 Q. Okay, and did she indicate to you who took</p> <p>12 the photographs?</p> <p>13 A. No, sir, she didn't.</p> <p>14 Q. Okay. And did you ever see any members of</p> <p>15 GCAR taking pictures of the animals?</p> <p>16 A. Not unless they came when I wasn't there.</p> <p>17 Q. Okay. And if a GCAR member -- prior to the</p> <p>18 Sheriff determining that they should have limited access</p> <p>19 to the shelter, if a GCAR member wanted to go into the</p> <p>20 shelter and you weren't there, how would a GCAR member</p> <p>21 have done that?</p> <p>22 A. Starting out, they had their own key.</p> <p>23 Q. Okay. Well, at some point, weren't the</p> <p>24 keys collected?</p>	<p>1 Q. Can you just briefly walk me through a</p> <p>2 little bit of what you did when you got to work at 8:00 or</p> <p>3 8:30 in the morning? I he just want to know a little bit</p> <p>4 about your day. I know that you are cleaning and feeding</p> <p>5 the animals, but walk me through what you do when you get</p> <p>6 there.</p> <p>7 A. The first thing I do is check the messages;</p> <p>8 I would check those and return those. I would go into the</p> <p>9 kennel area; we had four outside kennels, so I would take</p> <p>10 four dogs out and let them run in the run area while I</p> <p>11 clean and sanitize kennels. I would put them in clean</p> <p>12 kennels, put the food and water in, and then I would bring</p> <p>13 the animals in, and that is the way that I done it until I</p> <p>14 got all of animals done, and then I would start in the cat</p> <p>15 room, clean their cages, feed them.</p> <p>16 Q. Okay. What would happen if an animal, by</p> <p>17 your observation, needed medical treatment?</p> <p>18 A. I would call and get the okay and</p> <p>19 permission from Sheriff Morgan, and I contacted animal</p> <p>20 control and animal control would come and take the</p> <p>21 animal. If they weren't available, I would take it</p> <p>22 myself.</p> <p>23 Q. And where would the animal be taken?</p> <p>24 A. To the vet out here in town.</p>

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<p>1 Q. Okay. But you would have to get 2 authorization from Sheriff -- from the Sheriff before you 3 would take this animal to seek medical treatment; is that 4 what you are saying? 5 A. Yes. 6 Q. Okay. Did you ever have any difficulty 7 getting in contact with the Sheriff to do that? 8 A. No, sir, I didn't. 9 Q. Okay. And how were animals put down at the 10 shelter? 11 A. Euthanized. 12 Q. Was that by injection? 13 A. Yes. 14 Q. A toxin? 15 A. Hmm-hmm. 16 Q. Is that a yes? 17 A. Yes. 18 Q. And who would perform those services? 19 A. Animal control. 20 Q. You never did that? 21 A. No, sir. 22 Q. And do you know if the euthanizations of 23 the animals increased after the volunteers were prevented 24 access to the shelter?</p>	<p>1 Q. Okay. All right, and did you ever examine 2 the animals to see if they had any sort of health issues, 3 and I know that you are not a veterinarian, and neither am 4 I; I know that you are not a nurse, but did you ever look 5 at the animals to see if they were having any sort of 6 health issues? 7 A. Yes, I was in contact with the animals 8 every day. 9 Q. All right. 10 A. If they needed -- you know, I examined them 11 when I bathed them. If they needed bathed, I gave them a 12 bath. They were always looked over, nails checked. 13 Q. Okay. And I want to read another paragraph 14 here, and I will represent to you that this is from 15 another email that is purported to be written by Christine 16 Link-Owens, and I want to see if you know anything about 17 what she's talking about here, okay. 18 A. Okay. 19 Q. "Cassidy is a large white American bulldog 20 mix. She suffered a spider bite on her front leg while 21 housed at the shelter. Volunteers visited the shelter on 22 Sunday. She was fine. Then on Monday, they noticed that 23 she had a swollen area on her leg near the elbow and she 24 was limping. On Tuesday, her entire leg was swollen and</p>
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<p>1 A. No. Our euthanization rate went down and 2 the adoption rate went up. 3 Q. Okay. Bear with me just a second. 4 A. Our adoption and rescue rate. 5 Q. Did you ever have any issues with animals 6 receiving burns to their skin because of laying in excess 7 waste on the floor of the shelter? 8 A. No, sir. 9 Q. That never happened? 10 A. No, sir. 11 MR. GUYNN: Ask another question because 12 that is not right. 13 BY MR. STRELKA: 14 Q. Are you aware of whether or not any animals 15 at the shelter -- 16 (Off the Record.) 17 BY MR. STRELKA: 18 Q. Are you aware of whether or not any animals 19 at the shelter received burns because of laying in excess 20 waste? 21 A. No, sir. 22 Q. So that never happened? Well, as far as 23 from what you knew, that never happened; is that right? 24 A. Correct.</p>	<p>1 she could barely walk. She is lethargic, her entire body 2 was limp, she had a high fever. It took two volunteers to 3 pick her up and encourage her to walk outside for a 4 bathroom break. No medical treatment was sought for her. 5 Finally on Wednesday we convinced animal control to let us 6 take her to a vet." Do you recall any situation in which 7 that occurred? 8 A. No, sir. 9 Q. Did anyone ever talk to you about a 10 situation like that? 11 A. No, sir. 12 Q. And would you have noticed if a dog was 13 exhibiting signs of poor health as I just indicated? 14 A. Yes, sir, I would have known it. 15 Q. Is it possible that you did not show up for 16 a couple of days? 17 A. No, sir. 18 Q. Okay. 19 Q. Have you ever -- are you aware of any 20 member of GCAR complaining about it taking too long for 21 suffering animals to be euthanized? 22 A. No, sir. 23 Q. Okay. I understand that -- I know that you 24 didn't do the euthanization, but I just wondered if you</p>

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<p>1 had ever heard anything about it. Our next witness is</p> <p>2 here. Let me just say hi to her real quick. I will be</p> <p>3 right back. Off the Record.</p> <p>4 MR. GUYNN: Sure.</p> <p>5 (Off the Record.)</p> <p>6 BY MR. STRELKA:</p> <p>7 Q. Are you aware of a requirement at the</p> <p>8 shelter for a deposit to be paid that could be returned if</p> <p>9 there was evidence of the dog being spayed or neutered was</p> <p>10 presented?</p> <p>11 A. Yes, sir.</p> <p>12 Q. What is your understanding of that policy</p> <p>13 as it was when you were working there?</p> <p>14 A. You would go to the vet and bring your</p> <p>15 prepaid slip that you had prepaid to have them spayed or</p> <p>16 neutered, pay your adoption fee, and you could take the</p> <p>17 animal. If you didn't have the slip from the vet, you</p> <p>18 paid a \$150 deposit, and when you returned the slip from</p> <p>19 the vet, then you would get your refund back.</p> <p>20 Q. Okay, and so you would take this money at</p> <p>21 the shelter?</p> <p>22 A. If I was there.</p> <p>23 Q. You were there?</p> <p>24 A. Yes.</p>	<p>1 Q. What is that form?</p> <p>2 A. It is an adoption form.</p> <p>3 Q. Okay, and is that your handwriting on the</p> <p>4 form?</p> <p>5 A. It looks like it.</p> <p>6 Q. Okay, and do you see at the bottom where</p> <p>7 there is a -- it looks to be like a big loop at the very</p> <p>8 bottom, the bottom third of the page, a pen mark?</p> <p>9 A. Yes.</p> <p>10 Q. Okay, and do you recall making that mark?</p> <p>11 A. I don't remember.</p> <p>12 Q. Okay. Does that -- does the part of that</p> <p>13 ink mark that is -- is the text that that ink mark is</p> <p>14 resting upon, does that regard the deposit fee?</p> <p>15 A. It is -- it regards -- this would not have</p> <p>16 been filled out because the animal was already neutered,</p> <p>17 so if the animal is already spayed or neutered, they</p> <p>18 didn't have to bring in a vet form and they didn't have to</p> <p>19 pay the deposit if the animal was already spayed or</p> <p>20 neutered.</p> <p>21 Q. Are you remembering the situation from your</p> <p>22 memory or are you just indicating what it says on the</p> <p>23 form?</p> <p>24 A. No, it's marked that he's neutered.</p>
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<p>1 Q. And did you ever process an adoption and</p> <p>2 not collect that deposit fee?</p> <p>3 A. If they had a prepaid slip from the vet,</p> <p>4 you didn't collect that fee.</p> <p>5 Q. Okay. And Ms. Link is out there, and she</p> <p>6 just handed me this document that I have -- I mean, I</p> <p>7 wanted to ask her a question about it. Will you take a</p> <p>8 look at it? Ms. Link can certainly talk about it.</p> <p>9 MR. GUYNN: Let me see it.</p> <p>10 MR. STRELKA: Would you object if I made</p> <p>11 that an Exhibit and asked her some questions about</p> <p>12 it?</p> <p>13 MR. GUYNN: No.</p> <p>14 MR. STRELKA: All right, I would like this</p> <p>15 marked as an Exhibit.</p> <p>16</p> <p>17 (The above-mentioned document was marked as</p> <p>18 Deposition Exhibit Number 41 and entered into the</p> <p>19 Deposition.)</p> <p>20 BY MR. STRELKA:</p> <p>21 Q. Ms. Jones, I've just handed you a document</p> <p>22 labeled 41, and I would like to ask you if you've seen</p> <p>23 that type of form before.</p> <p>24 A. Yes, sir.</p>	<p>1 Q. Okay, so under your -- under awareness of</p> <p>2 the policy, you didn't have to collect any further funds?</p> <p>3 A. Just the adoption fee.</p> <p>4 Q. Which was how much?</p> <p>5 A. \$20.</p> <p>6 Q. All right, will you please turn the page?</p> <p>7 A. Yes.</p> <p>8 Q. So that would be a typical receipt that you</p> <p>9 might produce to a member of the public?</p> <p>10 A. Yes.</p> <p>11 MR. STRELKA: That is fine, that is all</p> <p>12 that I had to ask about. Okay. Let me take a</p> <p>13 quick one minute with him.</p> <p>14 (A recess was taken.)</p> <p>15 MR. STRELKA: I don't have any further</p> <p>16 questions for you. Please answer any questions</p> <p>17 that Mr. Guynn may have.</p> <p>18</p> <p>19 EXAMINATION BY JIM H. GUYNN, JR., ESQ.:</p> <p>20 Q. Ms. Jones, just a couple of things to make</p> <p>21 sure that I understand. When Dave Hunt hired you, he told</p> <p>22 you that your two responsibilities were to clean and</p> <p>23 feed.</p> <p>24 A. Yes, sir.</p>

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<p style="text-align: right;"><b>Page 54</b></p> <p>1 Q. And then how was it that you came to handle 2 adoptions?</p> <p>3 A. Well, I just -- it was just something that 4 I agreed to do when I was there, and I done it.</p> <p>5 Q. Okay, and did you talk to Dave Hunt about 6 doing it?</p> <p>7 A. No, sir.</p> <p>8 Q. Did you talk to the Sheriff about doing it?</p> <p>9 A. No, sir, not that I recall.</p> <p>10 Q. Was it something that you saw a need for 11 and you did?</p> <p>12 A. Yes, it was part of the routine out there, 13 and if I was there, I done it.</p> <p>14 Q. Okay. All right, now, was there a set time 15 for the volunteers to be at the shelter?</p> <p>16 A. It was from Saturday to Sunday, 2:00 to 17 4:00.</p> <p>18 Q. And so from Monday through Friday, the 19 volunteers were not at the shelter?</p> <p>20 A. I mean, when they had the key, they could 21 come out there and do pictures for the rescue or pull an 22 animal.</p> <p>23 Q. Okay, so the shelter was open from 2:00 to 24 4:00 on Saturday and Sunday and the volunteers were</p>	<p style="text-align: right;"><b>Page 56</b></p> <p>1 Were there other reasons that you would go back to the 2 shelter after you had cleaned and fed the animals?</p> <p>3 A. If an animal needed medication, you know, I 4 would have to go out and give it, or, you know, if someone 5 had called and said, hey, I found this animal, I would get 6 it and take it out there in my personal vehicle and put it 7 in a shelter.</p> <p>8 MR. GUYNN: Okay. I don't have any other 9 questions.</p> <p>10 EXAMINATION BY THOMAS E. STRELKA, ESQ.</p> <p>11 Q. Are you aware of when Dave Hunt was aware 12 of any of these issues in 2013 at the shelter?</p> <p>13 A. Do what now?</p> <p>14 Q. Are you aware of when Mr. Hunt became aware 15 of any of these issues at the shelter?</p> <p>16 A. I don't remember when he was -- the exact 17 date that he was aware of it, no. You would have to ask 18 him.</p> <p>19 Q. Did you ever discuss with him any of the 20 accusations?</p> <p>21 A. Yes, I did.</p> <p>22 Q. Okay. What was his response?</p> <p>23 A. He was shocked.</p>
<p style="text-align: right;"><b>Page 55</b></p> <p>1 operating the shelter at that time?</p> <p>2 A. As far as open to adoptions, yes, sir.</p> <p>3 Q. And they will handle the adoptions from 4 2:00 to 4:00 on Saturdays and Sundays?</p> <p>5 A. Yes, sir.</p> <p>6 Q. As far as your experience is concerned, 7 were there volunteers there when you would come in at 8:30 8 in the morning?</p> <p>9 A. No, sir.</p> <p>10 Q. Did your paycheck come from Greenbrier?</p> <p>11 A. Yes, sir.</p> <p>12 Q. You indicated that you might have to go 13 back out to the shelter if an animal needed medication?</p> <p>14 A. Yes, sir.</p> <p>15 Q. How far do you live from the shelter?</p> <p>16 A. At that time, I lived about --</p> <p>17 Q. Time wise?</p> <p>18 A. Twenty minutes.</p> <p>19 Q. Okay. Was there -- were there other 20 reasons why you would have to go back to the shelter at 21 night or after you had fed and cleaned -- fed animals and 22 cleaned the pens?</p> <p>23 A. Do what now?</p> <p>24 Q. That was an awkward question, wasn't it.</p>	<p style="text-align: right;"><b>Page 57</b></p> <p>1 MR. STRELKA: Okay. I don't have any 2 further questions.</p> <p>3 MR. GUYNN: Ms. Jones, we need to get a 4 signature on the transcript of the deposition that 5 the court reporter is going to prepare, your 6 signature, and we can do that in one of two ways. 7 She will prepare it, she will send it to you along 8 with an errata sheet, and you will have what, is 9 21 days, 30 days, to read it, sign it, send it 10 back to her, or you can waive your right to sign 11 it and authorize her as a notary public to sign 12 your name to it, and then if you want a copy of 13 it, we'll send it to you later.</p> <p>14 MR. MILLIRONS: Some of them have been 15 saying sign it for me and some of them are saying 16 that they want to read it.</p> <p>17 MR. GUYNN: I'm not your attorney, so I 18 can't advise you one way or the other.</p> <p>19 MR. MILLIRONS: I would go ahead and read 20 it and then you sign it and send it back.</p> <p>21 THE WITNESS: Okay.</p> <p>22 MR. GUYNN: You are free to go.</p> <p>23 THE WITNESS: Thank you.</p> <p>24 (The deposition concluded at 11:10 a.m.)</p>



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1 ERRATA SHEET

2 DEPOSITION OF: CHASTITY M. JONES

CASE: DUNN v. MILLIRONS

3 DATE TAKEN: APRIL 10, 2015

REPORTER: LISA M. HOOKER, RPR

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I have read the foregoing deposition and I wish to  
make the following changes:

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WITNESS NAME

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C E R T I F I C A T E

COMMONWEALTH OF VIRGINIA

COUNTY OF ROANOKE

I, Lisa M. Hooker, Notary Public in and for the Commonwealth of Virginia, at Large, do hereby certify that the Deposition of CHASTITY M. JONES was by me reduced to machine shorthand in the presence of the witness, afterwards transcribed under my direction by means of Computer, and that to the best of my ability the foregoing is a true and correct transcript of the Deposition as aforesaid.

I further certify that this Deposition was taken at the time and place in the foregoing caption specified.

I further certify that I am not a relative, counsel or attorney for either party or otherwise interested in the outcome of this action.

IN WITNESS WHEREOF, I have hereunto set my hand at Roanoke, Virginia, on this the 24th day of April, 2015.

*Lisa M. Hooker RPR*  
Lisa M. Hooker  
Notary Public

My commission expires October 31, 2015.

Notary Registration Number: 165043



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